



**DEPARTMENT OF THE ARMY**  
UNITED STATES ARMY GARRISON MANNHEIM  
UNIT 29901  
APO AE 09086-9901

IMEU-MAN-PW

APR 11 2006

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Environmental Management System (EMS) Standard Operating Procedure for Nonconformance and Preventive and Corrective Action at the United States Army Garrison (USAG) Mannheim

1. REFERENCES:

- a. Environmental Performance Audit Reports (Internal and External EPAS)
- b. Corrective Action Spreadsheet
- c. Internal EMS Reports

2. PURPOSE: To describe the process for identifying, documenting, analyzing, and implementing corrective and preventive actions. Preventive/corrective actions are issued during internal and external Environmental Performance Assessment System (EPAS) audits, EMS audits, compliance audits and other inspections/meetings.

3. APPLICABILITY: This procedure applies to the activities related to initiating, documenting, and implementing corrective or preventive action associated with the garrison's processes, procedures, services, or elements of the EMS.

4. DEFINITIONS:

a. Corrective Action: Action taken to eliminate the cause(s) of an existing nonconformity or noncompliance in order to prevent recurrence.

b. Nonconformance: The non-fulfillment of specified requirements. Out of conformance with this facility's EMS Manual, procedures or ISO (International Organization for Standardization) 14001 requirements.

c. Preventive Action: Action taken to eliminate the causes of a potential nonconformity or noncompliance in order to prevent occurrence.

d. Process Owner: The person responsible and accountable for improving the process in his/her charge and for implementing applicable corrective and/or preventive actions when necessary.

## 5. RESPONSIBILITIES:

- a. Environmental Management System Management Representative (EMSMR): Reviews nonconformance and status of corrective actions during the annual Management Review. Assigns responsibilities for preventive and corrective action.
- b. Environmental Media Area Manager: Maintain the Corrective Action Plan Spreadsheet (CAP) on the DPW sharedrive.
- c. Environmental Compliance Officer (ECO): Investigates unit-related nonconformances, and forwards result to EMSMR.
- d. EMS Coordinator: Reviews proposed corrective actions and monitors progress of CAP.
- e. Corrective Action Review Team: Assigned action officer and Environmental Management Division (EMD) supports the EMS Coordinator in reviewing proposed corrective action.
- f. Process Owner: Implements corrective and/or preventive action as identified in the CAP.

## 6. PROCESSES:

- a. Identifying and Reporting: Nonconformances are usually identified during audits or inspections. A major process for the identification of areas of non-compliance/non-conformance is the external Environmental Performance Assessment System (EPAS), conducted every three years, and the annual internal EPAS. Nonconformance may also be identified during external or internal inspections, the annual EMS Management Review, EMS or compliance audits.

Each employee has the opportunity to request preventive or corrective action for activities in which they are involved or which they have observed. The request is directed to his or her ECO who determines if the nonconformance is pertinent to the employee's unit or organization. If the activity is within their area of responsibility/-control, the ECO will then contact the EMD to coordinate activities with the appropriate EMD Media Area Manager to investigate and correct, if necessary, the issue(s) raised. If, however, the nonconformance is outside the scope of the unit or organization, the employee or ECO forwards it to the EMS Coordinator for disposition.

- b. Investigation and Analysis: Once a nonconformance has been reported, an investigation follows to determine its root cause, its magnitude, its possible impacts on the environment, health and safety and its potential consequences. The root cause analysis will identify why the problems are occurring and will prevent from reoccurring.

c. Mitigation of Impacts: For nonconformance that impacts the environment measures for its mitigation need to be established immediately. Measures are proposed by the process owner or ECO and will be forwarded to the Environmental Management Division for approval. Once the impact is mitigated, preventive action needs to be established to prevent the nonconformance from reoccurring.

d. Corrective and Preventive Action: Once a proposed corrective/preventive action is approved by the EMD, the Environmental Media Area Manager will make an entry into the Corrective Action Plan (CAP) spreadsheet. This entry should include at a minimum:

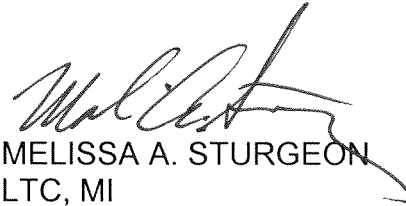
- (1) Finding ID
- (2) FGS Protocol chapter
- (3) Finding summary
- (4) Installation name
- (5) Project number (if applicable)
- (6) Project contract unit/activity
- (7) Root cause
- (8) Corrective action
- (9) Proposed completion date
- (10) Progress status
- (11) Actual completion date
- (12) Resources needed
- (13) Action officer assigned to complete CAP

This plan is reviewed biweekly by the Chief, EMD. During the annual Management Review the corrective action status will be reviewed and procedures revised if necessary.

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